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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 JOSE VILLANUEVA,

11 Plaintiff,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.

14 Defendants.

Case No.: 2:24-cv-00125-ART-DJA

**STIPULATION TO EXTEND EXPERT
DISCLOSURE DEADLINE**

15 Defendants Las Vegas Metropolitan Police Department ("LVMPD") and Francis Soriano
16 (collectively "LVMPD Defendants"), through their counsel, Kaempfer Crowell, and Plaintiff
17 Jose Villanueva, acting pro se, stipulate and agree to extend the current deadline for initial expert
18 disclosures by 45 days, from April 4, 2025, to May 19, 2025, for the reasons stated below:

- 19 (1) On March 7, 2025, the Court issued a Scheduling Order, (ECF No. 19), creating a
20 90-day discovery plan.
- 21 (2) The Order set June 5, 2025, as the cutoff date for discovery.
- 22 (3) Based on this cutoff date and this Court's Local Rules, the current initial expert
23 disclosure deadline is April 4, 2025.
- 24 (4) Good cause exists to extend this initial expert disclosure deadline based on the

specific circumstances of this case. Specifically, Plaintiff is acting pro se and detained in a facility outside of Las Vegas. So his ability to exchange relevant records in his possession requires mailing, which can take 3-5 days to get to LVMPD Defendants' counsel from the date he provides them to his facility's officials. This slower process prevents the parties from having enough time to exchange relevant records now that discovery began on March 7, 2025, review those records, engage in written discovery requests, then provide a comprehensive collection of information to a potential expert for analysis and drafting of a report by April 4, 2025. Additionally, LVMPD Defendants intend to take a deposition of Plaintiff based on records disclosed at the start of discovery and preliminary written discovery requests, which may impact an expert's report and conclusions.

In order to efficiently move this case forward through discovery and ensure any retained expert has comprehensive records before incurring expenses to prepare a report, the parties stipulation and agree to extend the current expert disclosure deadline from April 4, 2025, to May 19, 2025.

Dated this 27th day of March, 2025.

Dated this 21st day of March, 2025.

/s/ Lyssa S. Anderson

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IT IS SO ORDERED.

Dated this 28th day of March, 2025.

Daniel J. Albrechts

DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE